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May 1, 2019

VIA ECF

The Honorable Nicholas G. Garaufis
United States District Judge
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Keith Raniere, 18 Cr. 204 (NGG)

Dear Judge Garaufis:

Defendant Keith Raniere respectfully requests that this Court order the government to provide him with the witnesses the government intends to call next week. As this Court is aware, opening statements begin Tuesday, May 7, 2019, and the parties expect witness testimony immediately following this. Raniere has previously requested a witness list as soon as possible (4/22/19 Tr. at 178), which the government opposed (*id.* at 179). The government has instead indicated that it will notify the defense “within 48 hours” of the witnesses they intend to call. (*Id.*) This Court reserved decision on this matter, stating “I’m not going to ask the government to produce the witness list that far in advance; 48 hours might not be enough, but I’ll think about it.” (*Id.*)

Raniere respectfully asks this Court to order the government to disclose which witnesses it intends to call next week and the order in which the government intends to call them.

Respectfully submitted,

/s/

Marc A. Agnifilo, Esq., *Of Counsel*
Teny R. Geragos, Esq.

cc: Counsel for the government (via ECF)